

TOTE SERVICES Inc. INTERNAL AUDIT: S.S. EL FARO March 6, 2014

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This sixth ISM internal audit for the *S.S. El Faro* was scheduled to take advantage of the vessels as she was being re-activated in Jacksonville for return to service. The vessel was laid up in Baltimore until December 6th 2013, at which time TOTE services requested an interim ABS audit for the vessel to activate and sail to Jacksonville. Upon arrival JAX, the vessel proceeded to Atlantic Marine shipyard to lay-up. The timing of the break out in early March worked out well as TSI was able to get the internal audit within the 3-month time mandated frame. The vessel made several trips to Puerto Rico and will return to Atlantic Shipyard for the fitting of the fructose tanks. It is anticipated that the ship will return to service in late April or early May and at that time the company will schedule the initial ABS external. The master was advised in advance of this internal audit and was supplied with a list of first review items. This audit meets the rule for annual internal auditing and included the elements of the 14001 certification however the vessel will only apply for ISM certification.

The audit was opened during a meeting with the Captain and Chief Engineer. A schedule of departmental visits was developed that would not hinder activation operations. The opening meeting covered new regulatory and policy initiatives since the last audit. Captain Axelsson is very familiar with TSI policy and procedures. In particular, the need to establish a 'Job Hazard Analysis' program using the EPMV guidelines and the new TSI form. The issue of adding the CO2 system servicing to the list of Permitted work was also discussed.

The "Records & Guidelines" binder was reviewed and older records removed. All N/C's from the previous internal audit were signed off as being completed. The ISM Committee log was current. The Non-Conformity Log has been properly updated.

The last Master's Review was completed on Feb of 2012. Due to the lay-up and break out of the vessel the ISM certificate lapsed and the ship was unmanned while laid up. A Master's review needs to be done before the ABS external audit.

The most recent update of the OMV, EPMV and the FORMS had been received on board and inserted in the Master's copy of the manuals. The C/E had not completed the insertion of all of the changes at the time of the audit.

In particular, the need to establish a 'Job Hazard Analysis' program using the EPMV guidelines and the new TSI form. The issue of adding the CO2 system servicing to the list of Permitted work was discussed.

The TSI Training Material held on board inventory (SAF-002) had been completed and was filed in the T&A. The TSI Quarterly Safety Training and Quarterly Safety Drills was being implemented

Deck Dept.

I noted the following form my time spent with the Captain, C/M & 2/M:

- 1. The bridge set up is very well done. I searched for forms that were out of date and reviewed the bridge pubs. The standing orders were signed and included the new requirements for list and trim. The stability reports were signed. The Capt. & Mates have devoted significant resources to keeping the Ballast Mgt. book, the Waste Mgt. book and the other regulatory items up to date. The ship is completing the NPDES form.
- 2. The Captain described that the TSI FORMS Disc contents as being placed on the ships network.
- 3. The training records are very well ordered and maintained.
- 4. The bridge set up was in good order and well documented.



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- 5. The bridge publications were reviewed. The 2/M was asked to review the revised OMV section 18 and review the required pubs list.
- 6. The wire and mooring rope certificate and maintenance binder continues to see improvement.
- 7. The vessel antenna diagram needs to be updated.
- 8. Several of the container walk way gratings on the main deck were found to be in need of repair.

Engine Dept.

The C/E's ISM books were found to be complete and awaiting the insertion of the last of the updates. updates. The ORB and Related Info binder was found to be missing an update. TSI to provide. The Lock-out /Tag-out log was well kept. Old LO/TO records need not be kept more than one month. Completed pages of the log should be discarded. There were no open tags in the engine room.

The "ORB and Related Info Binder" is being properly kept. The semi-annual OWS audit and the Annual vessel inspection by the PE are due.

A review of the 'Non-Crew Indoctrination' program showed that the process is working as intended. This process is vital to ensure that contractors observe safe working practices and do not create damage or worse while on board.

STEWARD

I met with the Steward. We reviewed the emergency procedures. All members of the dept. showed evidence of having received indoctrination training and were conversant with galley safety procedures. The steward reported no equipment problems and there were no reports of pests or vermin.

The crew reports that the food is good and my inspection of the boxes and lockers found the galley to be orderly, clean. All leftovers were covered, there was no exposed meat and the veggies were found to be in good shape with no rotted or out-of-date food found. The Stwd. was completing the meal report and the Stores Receiving Reports.

Both chill boxes had problems with the condensate drains, the buckets need to be emptied regularly.

The Steward reported that there is no process in place to ensure that the staterooms have been adequately sanitized prior to crew departure. This was later discussed with the Captain.

SECURITY ISSUES

An audit for the vessel's ISPS plan as well as SSO training was conducted during this visit. As all records related to security are considered 'Security Sensitive,' a separate report will be completed. Documentation of Security issues must be stowed in the "Daily Occurrence Log Binder."



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CONCLUSION

The crew has gone through several break outs and lay-ups while maintaining TSI policy and procedures.

The safety record has been good and the crew morale was observed to be high.

CORRECTIVE ACTION REQUESTS / NON-CONFORMITIES ISSUED

EF-020 NEXT

OBSERVATIONS

- 1. A Master's review needs to be done before the ABS external audit.
- 2. The Semi-annual OWS Audit and the Annual vessel inspection by the PE are due.
- 3. The C/E had not completed the insertion of all of the changes at the time of the audit.
- 4. The vessel antenna diagram needs to be updated.
- 5. Several of the container walk way gratings on the main deck were found to be in need of repair.
- 6. The ORB and Related Info binder was found to be missing an update. TSI to provide.

| Auditor: | | Date: March 25, 201 | | |
|----------|---------------|---------------------|------|--|
| | Harry Rogers | | | |
| Master: | | | | |
| | Eric Axelsson | | Date | |

TOTE Services Inc. SECURITY AUDIT REPORT

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An audit of the vessel's ISPS plan was conducted in Jacksonville, on March 6th 2014. As all records related to security are considered 'Security Sensitive,' this report must be filed in the "Daily Occurrence Log Binder."

The TSI Company Security Officer (CSO) met with the Master and 2/M (SSO) to conduct the audit and to conduct SSO training. We reviewed the plan and implementation and the changes necessary to meet the requirements associated with the vessel name change. The security plan will be reviewed in conjunction with each internal ISM audit.

It was determined that:

- 1. The station bills have been modified to reflect the 'fire/emergency/security' signal and identify the security duties of the crew members.
- 2. Emergency communications and the use of the SSAS in emergencies, tests and exercises were reviewed.
- 3. The method of certifying the bag searches (Visitor's Logsheet) is easy to understand and is working well.
- 4. The Captain stated that SSO has undertaken his duties with diligence & has brought order to the process.
- 5. The MARSEC level sign was not observed to be in place at the gangway. The search policy was prominently posted.
- 6. A review of the training was conducted. The records of training, the daily occurrence logs and drills were in order and well organized.
- 7. The Daily Occurrence Log Binder has been well kept and provides a useful compendium of security related issues and events. The TSI Security Alerts were incorporated and in order.
- 8. The ship has had the new SSAS installed and has participated in several quarterly testing cycles. The last SSAS drill was 12/9/13. The Appendix 4 of the ISPS plan has been amended to reflect the new SSAS.
- 9. The SSO reports that there are no missing badges. Badges are numbered and have an expiration date.
- 10. All crew hold TWIC's.
- 11. The designation of the SSO was properly posted.
- 12. The Master and SSO have generated a list of master keys and key holders.
- 13. There were zero non-conforming practices found during this audit.
- 14. All CSR certificate originals were located in the TSI Certificate Binder.
- 15. The instructions to the gangway have been simplified and laminated. The new crew sign-on/off logbook is in use and an external
- 16. The last ISPS Exercise was conducted on 12/9/13.

Observations

1.None

| Man | y thank | cs to 1 | the S | SSO | (2/M) | Charles | Baird) |) for his | diligence and | l significant | efforts as | the S | SSC | Э. |
|-----|---------|---------|-------|-----|-------|---------|--------|-----------|---------------|---------------|------------|-------|-----|----|
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| Auditor: | | March 25, 2014 |
|----------------|--------------------|----------------|
| | Harry Rogers (CSO) | , , |
| Master or SSO: | | Date |
| | [PRINT/SIGN] | |